

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
EASTERN DIVISION**

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

PLAINTIFF

v.

NO: 2:22-CV-00131-KS-MTP

TRACTOR SUPPLY COMPANY

DEFENDANT

**JOINT MOTION FOR EXTENSION OF DEADLINES
TO COMPLETE DISCOVERY AND FILE DISPOSITIVE MOTIONS AND FOR
CONTINUANCE OF SETTLEMENT CONFERENCE AND TRIAL DATE**

COME NOW the parties, and jointly move the Court for an extension of the deadline to complete discovery and file dispositive motions, and for a continuance of the settlement conference and trial date. In support of their motion, the parties state the following:

1. The current deadline for completing discovery in this matter is January 2, 2024, and the deadline for filing dispositive motions is January 16, 2024. The trial in this case is set for June 3, 2024, and the parties are scheduled for a settlement conference on January 3, 2024 in Hattiesburg.

2. The parties have completed substantially all discovery this matter, and were on track to complete discovery by the current deadline. However, noticed depositions of Defendant's corporate representative, Charging Party Jane Doe, and one other individual had to be cancelled due to event outside the parties' control: a death in the family of Defendant's corporate representative and the sudden illness of Defendant's counsel.¹ The depositions of Doe and Defendant's corporate representative are important to a fair and just resolution of this matter. The

¹ Defendant's counsel fell very ill early in the morning of December 28 and is continuing to run a high fever.

parties therefore request that they be permitted until February 29, 2024 to complete discovery, and until March 15, 2024 to file dispositive motions.

3. Further, because counsel for Defendant may remain too ill to travel to the settlement conference next week, the parties request a continuance of the settlement conference until a date convenient to the Court during the first two weeks of February.² The parties also believe that the settlement conference would be more productive if continued, because it would allow the parties to complete the cancelled depositions. Moreover, the parties believe that the settlement conference will be more productive if continued, because the parties will use the continuance to further negotiate and exchange drafts of settlement terms.

4. Accordingly, because these extensions will require a continuance of the trial date, the parties also request that the trial in this matter be continued.

6. Finally, due to the straightforward nature of this motion, the parties request that they be excused from the requirement of filing a supporting memorandum.

THIS, the 29th day of December, 2023.

Respectfully submitted,

/s/ M. Kimberly Hodges

M. Kimberly Hodges (MS Bar No. 100276)

OGLETREE, DEAKINS, NASH,

SMOAK & STEWART, P.C.

International Place Tower II

6410 Poplar Avenue, Suite 300

Memphis, TN 38119

Telephone: 901.767.6160

Facsimile: 901.767.7411

Email: kim.hodges@ogletreedeakins.com

ATTORNEYS FOR DEFENDANT

² To assist with finding a date convenient for the Court, the parties and their counsel are willing to come to any courthouse for the conference.

/s/ Trent Thompson (with permission)

Trent Thompson (NY Bar No. 5232525)

EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION

Birmingham District Office
Ridge Park Place, Suite 2000
1130 22nd Street South
Birmingham, Alabama 35205
Telephone: (205) 651-7065
Facsimile: (205) 212-2041

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I, counsel for Defendant, hereby certify that a copy of the foregoing was electronically submitted via the Court's Electronic Case Filing System, and notification of such filing will be served upon all counsel of record on this, the 29th day of December, 2023.

/s/ M. Kimberly Hodges

M. Kimberly Hodges (MSB #100276)
Counsel for Defendant